

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

JOINT MOTION TO AMEND JOINT AMENDED DISCOVERY PLAN
[COURT DOC. 21]

Plaintiff Lynn M. Lane and Defendant Nationwide Mutual Fire Insurance Company jointly move under [Court Doc. 21] and Federal Rule of Civil Procedure 16 to extend the deadline for filing witness lists to Tuesday, November 19, extend discovery twenty-five days to Friday, December 20 and extend the dispositive motion deadline in this action eighteen days to January 2, 2014. The requested extension will not affect the trial date or any other dates provided in the previously entered Joint Amended Discovery Plan [Court Doc. 21].

The requested extension is required to allow Defendant Nationwide to depose Plaintiff, who has dealt with continual health issues during the discovery period. The unfortunate health challenges of Plaintiff satisfy the good cause standard for modifying the Discovery Plan under Federal Rule of Civil Procedure 16. The parties anticipate scheduling this matter for mediation following the completion of Plaintiff's deposition.

Thus, the Parties jointly move to amend the Joint Amended Discovery Plan.

Respectfully submitted,

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-and-

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been served via the Electronic Case Filing system of the United States District Court for the Eastern District of Tennessee, to all attorneys of record.

This 14th day of November, 2013.

s/Tonya Kennedy Cammon

Tonya Kennedy Cammon